

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,
Plaintiff,

No. CR 14-00175 WHA

v.

PACIFIC GAS AND ELECTRIC
COMPANY,
Defendant.

REQUEST FOR INFORMATION

The Court has received the submission of Attorneys Pitre and Campora (Dkt. No. 1005). By **FEBRUARY 22 AT NOON**, PG&E shall please respond, on a paragraph-by-paragraph basis, to Attorneys Pitre and Campora's submission, specifically admitting, denying, or clarifying for accuracy each and every statement from page 1 through page 15, line 9. Please quote each paragraph (single-spaced and indented) followed by your response. Please be forthright. PG&E shall also provide answers to the following questions:

1. With respect to the written testimony of Janaize Markland cited on the first page of Attorneys Pitre and Campora's submission, please clarify whether Ms. Markland's reference to 17 tree-related outages per 1,000 miles should have been "< 2 percent of trees in contact," rather than "< 0.02 percent of trees in contact," an apparent error by a factor of 100.
2. What vegetation clearance requirements exist for PG&E power lines on federal land?

